

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: ALRICK TROY EMERSON MARNER : CHAPTER 13  
and TAMEKA ELIZABETH WILLIAMS :  
Debtors :  
 :  
JACK N. ZAHAROPOULOS :  
STANDING CHAPTER 13 TRUSTEE :  
Movant :  
 :  
vs. :  
 :  
ALRICK TROY EMERSON MARNER :  
and TAMEKA ELIZABETH WILLIAMS :  
Respondents : CASE NO. 5-22-bk-01617

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 31st day of October, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtors' plan for the following reason(s):

1. Failure to properly state the minimum amount to be paid to unsecured creditors in Section 1A of the plan, as required by the Mean Test.
2. The Trustee avers that debtors' plan is not feasible based upon the following:
  - a. The plan is underfunded relative to claims to be paid.

WHEREFORE, Trustee alleges and avers that debtors' plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 4th day of November, 2022, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Timothy Fisher, II, Esquire  
P.O. Box 396  
Gouldsboro, PA 18424

/s/Deborah A. Behney  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee